

EXHIBIT 74

**DECLARATION UNDER PENALTY OF PERJURY
PURSUANT TO 28 U.S.C. § 1746**

1. My name is Carol Sealey. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Clay County in Georgia and my residence address is [REDACTED]
[REDACTED] Fort Gaines, GA, 39851.
3. All the precincts expect for one closed in the entire county I live in, and many people did not have transportation to go and vote. They had to travel 5-6 miles to the nearest location. Many people used to walk to the polling location in their community, but they could no longer do that due to the poll closure. Some people would have to pay someone gas money for a ride to the polls, and many people in the community do not have money to give away.
4. Before they closed the polling location, I would vote at one place and my mom, who lives down the street, had to vote at another location. Voting in Clay County had always been confusing, and then the county just shut down all the polling locations except the one. Many of my neighbors have to travel 10-15 miles to go and vote. I was able to drive to the polling location because I had access to a car. I was also able to drive some of my neighbors who wouldn't be able to travel due to the lack of transportation.
5. I found out the polling locations had closed on Election Day because I went to monitor the polling location in the Blufton area, but an officer, who was

there to vote, said the location I was heading to was no longer there. He told me all the voters in that area now had to come to my polling location.

6. I don't understand the purpose of having people drive all that way to vote.
7. My community is one of the poorest counties in Georgia, so our community has always experienced funding issues. The majority of people who live around me are black, and many of the elected officials and county workers have never stood up to fight for the issues that are important for the people in my community. I believe that many of these county workers, who are mainly black, are scared to stand up and speak out. Because of this, many people in my community don't believe in voting because they believe it doesn't matter.
8. I also had to assist an older man who wasn't able to read and write and didn't have a ride to the polls. I picked him up and took him to vote. He asked the poll worker if I could assist him, and they said yes. He ended up having a problem with his birthday. His ID had his birthday on one day, but the voter registration system had another day. Luckily, a judge was there, and the judge told the poll workers that she would get that change made. But I believe if the judge hadn't been there, the man wouldn't have been able to vote. The man was very shocked that they had the wrong birthday because that was the only birth date he had ever used. I do know that he was able to vote because I assisted him at the voting machine.

9. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.
10. I understand that in giving this Declaration, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.
11. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 22 day of May, 2019.

Carol Sealey
Signature